

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In the Matter of)	
)	
Petition for Arbitration of Interconnection)	
Agreement between Time Warner Cable)	
Information Services (South Carolina), LLC,)	Docket No. 2011-243-C
doing business as Time Warner Cable and)	
Farmers Telephone Cooperative, Inc.)	

In the Matter of)	
)	
Petition for Arbitration of Interconnection)	
Agreement between Time Warner Cable)	Docket No. 2011-244-C
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
Fort Mill Telephone Company)	

In the Matter of)	
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Petition for Arbitration of Interconnection)	
Agreement between Time Warner Cable)	Docket No. 2011-245-C
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
Home Telephone Co., Inc.)	

In the Matter of)	
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Petition for Arbitration of Interconnection)	
Agreement between Time Warner Cable)	Docket No. 2011-246-C
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
PBT Telecom, Inc.)	

**TIME WARNER CABLE INFORMATION SERVICES (SOUTH CAROLINA), LLC'S
MOTION TO CLARIFY THE PETITIONS FOR ARBITRATION**

Pursuant to 26 S.C. Code Regs. 103-829 and other rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), Time Warner Cable Information

Services (South Carolina), LLC, doing business as Time Warner Cable (“Time Warner Cable”), moves to clarify its petitions for arbitration seeking resolution of any open issues arising between Time Warner Cable and Farmers Telephone Cooperative, Inc. (“Farmers”); Fort Mill Telephone Company (“Fort Mill”), Home Telephone Co., Inc. (“Home”), and PBT Telecom, Inc. (“PBT”) (collectively “ILECs”) in the negotiation of Interconnection Agreements (“ICAs”) with each ILEC. Time Warner Cable respectfully moves to be allowed to clarify that the main issue for resolution by this petition for arbitration is whether Time Warner Cable is entitled to interconnection with the ILECs under 47 U.S.C. § 251 and 252 on the following grounds:

1. On January 20, 2011, Time Warner Cable provided notice to the ILECs of its intention to adopt the Sprint-ILEC ICAs pursuant to Section 252(i) of the Communications Act. Copies of the January 20, 2011, letters to the ILECs were attached to the initial petition and are incorporated by reference.

2. On February 17, 2011, Lans Chase of John Staurulakis, Inc. (“JSI”) informed Time Warner Cable that it was ILECs’ position that Time Warner Cable is not eligible to adopt the Sprint-ILEC ICAs because Time Warner Cable supposedly is not a “Telecommunications Carrier as defined in 47 U.S.C.A. § 153(44)¹ of the [Communications] Act.” The February 17, 2011, letter from Mr. Chase is attached to the Revised Petition as **Exhibit 1**. The letter did not allege that the Sprint ICAs were not available for adoption because their initial terms have expired.

3. Time Warner Cable representatives, counsel for ILECs, and JSI representatives had a conference call on April 12, 2011, to discuss the issue. At no time during this discussion

¹ “Telecommunications Carrier” is defined in 47 U.S.C.A. § 153 (51).

did the ILECs or their representatives contend that the Sprint ICAs were not available for adoption because the initial terms of the ICAs had expired.

4. Mr. Chase responded to Time Warner Cable's request for clarification of Farmer's position by citing a portion of Douglas Meredith's testimony from the January 7, 2009, hearing held in the consolidated dockets 2008-325-C through 2008-329-C to amend Time Warner Cable's certification to include the service area of the ILECs. Mr. Chase apparently took the position that Time Warner Cable's reliance on IP technology in providing retail voice services somehow disqualifies Time Warner Cable from obtaining interconnection. The Chase email dated April 19, 2011 is attached to the Revised Petition as **Exhibit 2**. Neither the email nor the referenced testimony alleged that the Sprint ICAs were not available for adoption because the initial terms of the Sprint ICAs had expired.

5. On July 8, 2011, the ILECs filed their responses to the petitions for arbitration. The ILECs identified in each their responses the following "Statement of the Issue:"

The only issue for decision here is whether Time Warner is entitled to adopt the Interconnection Agreement dated (respective dates for each ILEC) between Sprint and RLEC. This question turns on the issue of whether or not Time Warner is entitled to request interconnection directly with RLEC, an issue which the Commission previously expressly declined to address in Docket Nos. 2008-325-C through 2008-329-C...The question of whether Time Warner is entitled to direct interconnection, in turn, depends on whether or not Time Warner is considered a "telecommunications carrier" providing "telecommunications service" under federal law, for purposes of triggering RLEC's obligation to provide interconnection under Section 251 of the Telecommunications Act.

RLECs' Responses to Petitions for Arbitration, p. 2-3. At no point in the Responses did the ILECs' assert that the Sprint ICAs were not available for adoption by Time Warner Cable.

6. Time Warner Cable agreed to grant the ILECs an extension until Monday, August 8, 2011, to file their testimony in this proceeding. For the very first time in testimony filed on August 8, 2011, the ILECs asserted that the Sprint ICAs were not available for adoption because

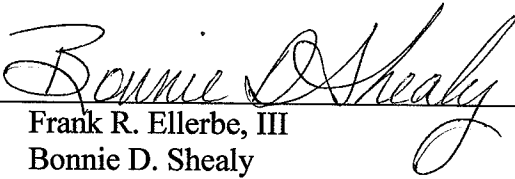
the initial term of the ICA had expired. Time Warner Cable asserts that this new “issue”—the expiration of the Sprint ICAs—is not the real issue in dispute between the parties. None of the ILECs have ever indicated that it would allow Time Warner Cable to adopt another ICA or indicated that it was willing to negotiate a new ICA. They have consistently maintained that they are not obligated to enter into an ICA with Time Warner Cable.

7. Given the late timing of this new assertion by the ILECs, Time Warner Cable believes it is necessary to clarify that the real issue in this petition for arbitration is whether Time Warner Cable is entitled to interconnect with the ILECs under 47 U.S.C. § 251. From January until August 8, 2011, as the ILECs noted in their responses to the petitions for arbitration, the question turns on the issue of whether or not Time Warner is entitled to request interconnection directly with ILECs. Therefore, the ILECs would not be harmed by our clarifying that Time Warner Cable seeks resolution of that pivotal issue in this arbitration proceeding. Attached and incorporated by reference is the revised petition for arbitration. For the reasons outlined above, we respectfully request that the Commission allow us to clarify our petition.

Dated this 16th day of August, 2011.

ROBINSON, MCFADDEN & MOORE, P.C.

By

A handwritten signature in cursive script, appearing to read "Bonnie D. Shealy", written over a horizontal line.

Frank R. Ellerbe, III

Bonnie D. Shealy

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Attorneys for Time Warner Cable Information Services,
(South Carolina), LLC

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REVISED PETITION FOR ARBITRATION

Pursuant to Section 252(b) of the Communications Act of 1934, as amended ("Communications Act"), 47 U.S.C. § 252(b), Time Warner Cable Information Services (South

Carolina), LLC, doing business as Time Warner Cable ("Time Warner Cable"), filed petitions for arbitration with the Public Service Commission of South Carolina ("Commission") seeking resolution of any open issues arising between Time Warner Cable and Farmers Telephone Cooperative, Inc. ("Farmers"); Fort Mill Telephone Company ("Fort Mill"), Home Telephone Co., Inc. ("Home"), and PBT Telecom, Inc. ("PBT") (collectively "ILECs") in the negotiation of Interconnection Agreements ("ICA") with each ILEC. Time Warner Cable files this revised petition for arbitration to clarify that the main issue for resolution by this petition is whether Time Warner Cable is entitled to interconnection with the ILECs under 47 U.S.C. § 251 and 252. The initial petitions and their exhibits are incorporated by reference. In support of this revised petition Time Warner Cable states as follows:

BACKGROUND AND HISTORY OF NEGOTIATIONS

1. Time Warner Cable is a limited liability company organized under the laws of the State of Delaware, maintaining its principal place of business at 60 Columbus Circle, New York, New York 10023. Time Warner Cable's main offices in the State of South Carolina are at 3347 Platt Springs Road, West Columbia, South Carolina 29170. Time Warner Cable is certified to provide telecommunications services in South Carolina pursuant to Commission Order Numbers 2004-213, 2005-385(A) 2009-356, and 2011-393.

2. Time Warner Cable's representatives in this proceeding are as follows:

Frank R. Ellerbe, III
Bonnie D. Shealy
Robinson McFadden & Moore, P.C.
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Post Office Box 944
Columbia, South Carolina 29202
Telephone (803) 779-8900
Facsimile (803) 252-0724
fellerbe@robinsonlaw.com
bshealy@robinsonlaw.com

and

Julie P. Laine
Time Warner Cable
60 Columbus Circle
New York, New York 10023
Telephone (212) 364-8482
Fax: (704) 972-6239
Julie.Laine@twcable.com

3. The ILECs are incumbent local exchange carriers (“ILEC”) as defined in 47 U.S.C. § 251(h) and are certified to provide telecommunications services in the State of South Carolina.

4. The name, address, and contact information for ILECs’ primary representatives during the negotiations with Time Warner Cable were provided in the petition filed on June 13, 2011.

5. Time Warner Cable was certificated to provide competitive, facilities-based intrastate local telecommunications services in the ILECs’ service area by Order Number 2009-356(A), Docket Number 2008-325-C, on June 11, 2009. This Order held that Time Warner Cable’s Digital Phone Service is a regulated telecommunications service as defined by S.C. Code Section 58-9-10 and that Time Warner Cable “continues to meet all statutory requirements for the provision of service as a CLEC as delineated in S.C. Code Ann. Section 58-9-280.”¹

6. Time Warner Cable initially arranged to purchase wholesale telecommunications services from Sprint Communications Company, LP (“Sprint”) in order to provide its telephone service to customers in the ILECs’ service area. Since it began providing its Digital Phone services, Time Warner Cable has relied on Sprint to, among other things, obtain interconnection

¹ Order Number 2009-356(A), p. 20 & 22.

with ILECs so that Time Warner Cable's customers can place calls to and receive calls from ILEC customers. Sprint also has obtained telephone numbers and handled telephone number portability on Time Warner Cable's behalf, playing a role specifically approved by the Federal Communications Commission ("FCC"). *See Time Warner Cable Request for Declaratory Ruling that Competitive Local Exchange Carriers May Obtain Interconnection Under Section 251 of the Communications Act, as Amended, to Provide Wholesale Telecommunications Services to VoIP Providers*, Memorandum Opinion and Order, 22 FCC Rcd 3513 (WCB 2007) (noting with approval Sprint's provision of wholesale telecommunications services to Time Warner Cable and other VoIP providers and Sprint's responsibility for numbering-related issues). The Sprint-ILEC ICAs were approved by the Commission and copies supplied with the Petition for Arbitration filed on June 13, 2011.

7. On June 11, 2009, the Commission issued Order Number 2009-356(A) amending Time Warner Cable's certificate of public convenience and necessity to include the ILECs' service areas. This order held that (1) Time Warner Cable is a provider of local exchange and interexchange telecommunications services, (2) Time Warner Cable is a "telephone utility" as defined by S.C. Code Section 58-9-10, and (3) Time Warner Cable's Digital Phone Service is a regulated telecommunications service as defined by S.C. Code Section 58-9-10.² Time Warner Cable has been providing regulated voice services to residential and commercial customers in the ILECs' service area since 2009 pursuant to the terms of its South Carolina tariff approved by the Commission.

8. Time Warner Cable is currently transitioning from providing its retail telephone services using an unaffiliated wholesale telecommunications carrier (such as Sprint) to providing

² Order No. 2009-356(A), p. 20 and 22.

its retail services via its own direct ICAs with ILECs in South Carolina. The Commission approved direct ICAs between Time Warner Cable and Horry Telephone Cooperative, Inc.; Hargray Telephone Co., Inc.; Verizon South, Inc.; BellSouth Telecommunications, Inc., dba AT&T; and Bluffton Telephone Co., Inc.³ In addition, the FCC recently reaffirmed the unequivocal right of competitive carriers such as Time Warner Cable to interconnect with rural ILECs such as these. *See Petition of CRC Communications of Maine, Inc. and Time Warner Cable Inc. for Preemption Pursuant to Section 253 of the Communications Act, as Amended, et al.*, Declaratory Ruling, FCC 11-83, WC Docket No. 10-143, GN Docket No. 09-51, CC Docket No. 01-91 (rel. May 26, 2011) (“*CRC Declaratory Ruling*”). As it makes this transition to direct interconnection in South Carolina, Time Warner Cable intends to file an access services tariff to provide wholesale telecommunications services to other carriers.

9. On January 20, 2011, Time Warner Cable provided notice to the ILECs of its intention to adopt the Sprint-ILEC ICAs pursuant to Section 252(i) of the Communications Act. Copies of the January 20, 2011, letters to the ILECs were attached to the initial petition and are incorporated by reference.

10. On February 17, 2011, Lans Chase of John Staurulakis, Inc. (“JSI”) informed Time Warner Cable that it was ILECs’ position that Time Warner Cable is not eligible to adopt the Sprint-ILEC ICAs because Time Warner Cable supposedly is not a “Telecommunications

³ Time Warner Cable – Horry Telephone Cooperative, Docket No. 2006-197-C, Commission directives dated July 12, 2006 and March 2, 2011; Time Warner Cable – Hargray Telephone Co., Inc., Docket No. 2006-233-C, Commission directive dated August 16, 2006 and June 8, 2011; Time Warner Cable – Verizon South, Docket No. 2007-25-C, Commission directives dated January 31, 2007 and January 13, 2010; Time Warner Cable – BellSouth, Docket No. 2005-353-C, directives dated February 21, 2006, August 16, 2006, and November 8, 2006; Time Warner Cable – Bluffton Telephone Co., Inc., Docket No. 2011-209-C, Commission Directive dated June 8, 2011.

Carrier as defined in 47 U.S.C.A. § 153(44)⁴ of the [Communications] Act.” A copy of the February 17, 2011, letter from Mr. Chase is attached as **Exhibit 1**.

11. Time Warner Cable representatives, counsel for ILECs, and JSI representatives had a conference call on April 12, 2011, to discuss the issue. At no time during this discussion did the ILECs or their representatives contend that the Sprint ICAs were not available for adoption because the initial terms of the ICAs had expired.

12. Mr. Chase responded to Time Warner Cable’s request for clarification of Farmer’s position by citing a portion of Douglas Meredith’s testimony from the January 7, 2009, hearing held in the consolidated dockets 2008-325-C through 2008-329-C to amend Time Warner Cable’s certification to include the service area of the ILECs. Mr. Chase apparently took the position that, notwithstanding this Commission’s definitive classification of Time Warner Cable as a regulated telecommunications carrier, and despite the FCC’s repeated rulings that competitive telecommunications carriers in any event may interconnect with ILECs for the specific purpose of providing wholesale services to interconnected VoIP providers, Time Warner Cable’s reliance on IP technology in providing retail voice services somehow disqualifies Time Warner Cable from obtaining interconnection in its wholesale capacity. A copy of the Chase email dated April 19, 2011 are attached as **Exhibit 2**.

13. On July 8, 2011, the ILECs filed their responses to the petitions for arbitration. The ILECs identified in each of their responses the following “Statement of the Issue:”

The only issue for decision here is whether Time Warner is entitled to adopt the Interconnection Agreement dated (respective dates for each ILEC) between Sprint and RLEC. This question turns on the issue of whether or not Time Warner is entitled to request interconnection directly with RLEC, an issue which the Commission previously expressly declined to address in Docket Nos. 2008-325-C through 2008-329-C...The question of whether Time Warner is

⁴ “Telecommunications Carrier” is defined in 47 U.S.C.A. § 153 (51).

entitled to direct interconnection, in turn, depends on whether or not Time Warner is considered a “telecommunications carrier” providing “telecommunications service” under federal law, for purposes of triggering RLEC’s obligation to provide interconnection under Section 251 of the Telecommunications Act.

ILECs’ Responses to Petitions for Arbitration, p. 2-3. At no point in the Responses did the ILECs assert that the Sprint ICAs were not available for adoption by Time Warner Cable.

14. Time Warner Cable agreed to a request by the ILECs for an extension until Monday, August 8, 2011, to file their testimony in this proceeding. For the very first time, in the testimony of Douglas Meredith filed on Monday, August 8th, the ILECs made the alternative argument that the Sprint ICAs were not available for adoption because the initial term of the Sprint ICAs had expired. Time Warner Cable asserts that this new “issue” – the expiration of the Sprint ICAs – is not the real issue in dispute between the parties to this arbitration. None of the ILECs has ever indicated that it would allow Time Warner Cable to adopt another ICA. None of the ILECs has offered to negotiate with Time Warner Cable on a new ICA.⁵ All of the ILECs have consistently maintained that they had no obligation to enter any ICA with Time Warner Cable.

15. Time Warner Cable asserts that it is entitled to interconnect with the ILECs under 47 U.S.C. § 251 and that is the real issue at dispute in this proceeding.

JURISDICTION

16. Section 252(b)(1) of the Communications Act allows either party to the negotiation to request arbitration during the period from the 135th to the 160th day after the date on which an ILEC receives a request for negotiation. 47 U.S.C. § 252(b)(1). Time Warner Cable’s requests for adoption of the ICAs were sent to the ILECs on January 20, 2011, via

⁵ Time Warner Cable at all times would have considered adopting an alternative ICA if requested to do so by the ILECs and Time Warner Cable would have at all times negotiated with the ILECs on a new ICA.

overnight mail. *See* Petition filed June 13, 2011, **Exhibit 1**. Accordingly, this petition is timely filed.

17. Pursuant to 47 U.S.C. § 252(b)(4)(C), the Commission must render a decision in this proceeding within nine months after the date on which the local exchange carrier received the request under this section. Therefore, the Communications Act requires the Commission to render a decision in this proceeding not later than October 21, 2011.

ISSUES FOR ARBITRATION

18. Time Warner Cable requests that the Commission resolve any open issues relating to Time Warner Cable's request for interconnection and services from the ILECs including whether Time Warner Cable is entitled to interconnect with the ILECs under 47 U.S.C. § 251. Pursuant to Section 252(i), a local exchange carrier is required to make available any interconnection, service or network element provided under an agreement approved pursuant to 47 U.S.C.A. § 252(e) to any other requesting telecommunications carrier upon the same terms and conditions.

19. If a rural carrier refuses to negotiate, as has occurred here, then the arbitration provisions in Section 252(b)(1) of the Communications Act are triggered after the statutorily prescribed time period has passed.⁶

20. The ILECs refusal to honor Time Warner Cable's request to allow Time Warner Cable to adopt the Sprint-ILECs ICAs pursuant to Section 252(i) on the grounds that Time Warner Cable is not a "telecommunications carrier" is factually and legally baseless. As noted above, Order Number 2009-356(A) specifically held that Time Warner Cable provides regulated telecommunications services as a competitive local exchange carrier. The only limitation placed

⁶ *CRC Declaratory Ruling*, ¶ 26.

on Time Warner Cable's ability to interconnect with the ILECs is that the interconnecting carrier must be certificated and regulated by the Commission.⁷

21. The main issue for arbitration in this proceeding is whether Time Warner Cable is entitled to interconnection under 47 U.S.C. § 251.

22. Time Warner Cable is also independently entitled to invoke 252(i) to obtain interconnection with ILECs based on its ability to offer wholesale telecommunications services.⁸ The wholesale transmission service that Sprint currently provides to Time Warner Cable pursuant to the Sprint-ILECs ICA is precisely the same service that Time Warner Cable seeks to provide on its own by adopting the Sprint-ILECs ICAs. Once interconnection agreements with the incumbent carriers are in place in its current service areas, Time Warner Cable plans to provide wholesale telecommunications services for its own interconnected VoIP operations and to other carriers.

23. In reaffirming that wholesale telecommunications carriers are entitled to interconnect and exchange traffic with ILECs, including rural carriers, the FCC stated that "a contrary decision would impede the important development of wholesale telecommunications and facilities-based VoIP competition, as well as broadband investment and deployment, by limiting the ability of wholesale carriers to offer service."⁹

WHEREFORE, Time Warner Cable requests that the Commission find that (1) Time Warner Cable is entitled to interconnection with the ILECs under 47 U.S.C. § 251; (2) require ILECs to execute Time Warner Cable's adoption agreement of the Sprint-ILECs ICA; and (3)

⁷ Order No. 2009-356(A), p. 19.

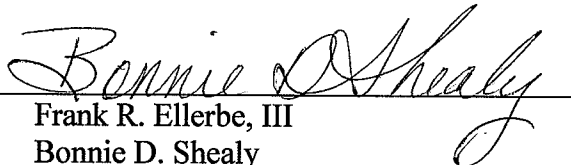
⁸ *CRC Declaratory Ruling*, ¶ 26.

⁹ *CRC Declaratory Ruling*, ¶ 27

such other relief as the Commission deems proper under the circumstances.

Dated this 16th day of August, 2011.

ROBINSON, MCFADDEN & MOORE, P.C.

By 
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Attorneys for Time Warner Cable Information Services,
(South Carolina), LLC

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**REVISED PETITION
EXHIBIT 1**

CHASE'S FEBRUARY 17, 2011 LETTER



6849 Peachtree Dunwoody Road
Building B-3, Suite 200, Atlanta, Georgia 30328
phone: 770-569-2105, fax: 770-410-1608

February 17, 2011

VIA ELECTRONIC MAIL & US MAIL

Ms. Maribeth Bailey
Sr. Director, Interconnection Policy, Regulatory
Time Warner Cable
60 Columbus Circle
New York, NY 10023

Re: *Request for Adoption of Interconnection Agreement*

Dear Ms. Bailey:

I am writing this letter on behalf of my clients Farmers Telephone Cooperative, Inc. ("Farmers"), Fort Mill Telephone Company ("Fort Mill"), Home Telephone Company ("Home") and PBT, Inc. ("PBT") in response to your letter dated January 20, 2011 in which Time Warner Cable Information Services (South Carolina), LLC ("TWCIS (SC)") requests to adopt, pursuant to Section 252(i) of the Telecommunications Act of 1996 (the "Act"), the Interconnection Agreement negotiated by and between each of the above-mentioned companies and Sprint Communications Company, LP ("Sprint").

It is our understanding that TWCIS (SC) is not a Telecommunications Carrier as defined in 47 U.S.C. §153 (44) of the Act and, therefore, that TWCIS (SC) is not eligible to adopt this agreement pursuant to Section 252(i) of the Act.

Should you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Lans Chase'.

Lans Chase
Staff Director – Regulatory Affairs
John Staurulakis, Inc.

cc: F.B Erwin, Farmers Telephone Cooperative, Inc.
Matt Dosch, Fort Mill Telephone Company
Keith Oliver, Home Telephone Company
Ben Spearman, PBT, Inc.

HEADQUARTERS:

7852 Walker Drive, Suite 200, Greenbelt, MD 20770
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phone: 512-338-0473, fax: 512-346-0822

Engandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

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Petition for Arbitration of Interconnection Agreement between Time Warner Cable Information Services (South Carolina), LLC, doing business as Time Warner Cable and Farmers Telephone Cooperative, Inc.)))))))	Docket No. 2011-243-C

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Petition for Arbitration of Interconnection Agreement between Time Warner Cable Information Services (South Carolina), LLC, doing business as Time Warner Cable and Fort Mill Telephone Company)))))))	Docket No. 2011-244-C

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**REVISED PETITION
EXHIBIT 2
CHASE'S APRIL 19, 2011 EMAIL**

From: Lans Chase [<mailto:lc Chase@jsitel.com>]
Sent: Tuesday, April 19, 2011 12:46 PM
To: Bailey, Maribeth
Cc: Laine, Julie; Mark Ozanick
Subject: SC RLECs

Maribeth,

Since I was not able to be on the conference call last week, I have followed-up with Peg Fox and Mark Ozanick to discuss the issue. It is my understanding that you asked for us to clarify our position regarding TWCIS's request to adopt the Sprint ICA. We have reviewed the Order in the consolidated dockets (2008-325-C, 2008-326-C, 2008-327-C, 2008-328-C, and 2008-329-C) as well as Douglas Meredith's testimony and our position has not changed. We believe that pages 22-30 of Mr. Meredith's testimony clearly lays out our position.

Thanks,
Lans

Lans Chase
Staff Director - Regulatory Affairs
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CERTIFICATE OF SERVICE


This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below
Time Warner Cable Information Services (South Carolina), LLC's Motion To Clarify The

Petitions For Arbitration in the dockets referenced above by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211
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C. Lessie Hammonds, Esquire
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
lhammon@regstaff.sc.gov
jnelson@regstaff.sc.gov

Dated at Columbia, South Carolina this 16th day of August, 2011.



Toni C. Hawkins